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September 27, 2019

VIA ECF

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
Courtroom 17A
500 Pearl Street
New York, New York 10007

**Re: Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC, Case No. 18-cv-2185 (JGK)-DCF
Golden Spring Subpoena**

Dear Judge Freeman:

We write for Defendant/Counterclaimant Strategic Vision US, LLC to present this joint motion, on behalf of all parties and with the signed agreement (indicated below) of new counsel for Plaintiff/Counterclaim Defendant Eastern Profit, for an enlargement of certain case deadlines.

On September 26, 2019, the parties conferred and reached agreement that additional time will be needed to complete certain discovery noticed before today's deadline, as well as the filing of dispositive motions under Fed. R. Civ. P. 56. With the pleadings and party written discovery now closed, the parties intend to take a discrete number of additional fact and witness depositions (and have identified to each other who those witnesses will be). With respect to three of those depositions, the parties are seeking certain rulings from this Court regarding their permissible scope and the documents to be produced. The parties also discussed that a small number of additional Fed. R. Civ. P. 45 document subpoenas to non-parties may be necessary. Therefore, the parties jointly request that the close of discovery be extended until November 29, 2019. The parties request that the deadline for the filing of dispositive motions be extended until January 10, 2020 to allow sufficient time to receive deposition transcripts and responses from non-parties to document subpoenas.

With the introduction of new counsel for Plaintiff, we look forward to moving this case to the point of dispositive rulings in accordance with these new deadlines. Thank you for your assistance.

Respectfully submitted,



Edward D. Greim
Attorney for Defendant/Counterclaimant



AGREED TO:

/s/ Francis Lawall
Francis Lawall, Pepper Hamilton LLP
Attorneys for Plaintiff/Counterclaim Defendant